

Audit Of Child Abuse and Neglect Response System Recommendations

We take our commitment to protecting children very seriously and are proud of the improvements made in the last several years. While there is always room for improvement, we feel this document borders on audit by anecdote and takes an overly simplified approach to an extremely complicated system.

Protecting children is difficult and vastly more challenging than designing the perfect system. Our staff is faced daily with making more serious judgement calls in people's lives than most people ever face in their lifetime. The standard they are held to is perfection, which is virtually unattainable.

For the record, we wish to register a strong disagreement with the harsh accusations and inflammatory generalizations used in the narrative. We will attempt to address the recommendations individually as listed below.

While Missouri's child protection system is better than most and has steadily continued to improve, we know intuitively that even with more staff, increased money and tougher laws, some children will still be lost to tragic circumstances. That is why solutions should involve more than one system. They include communities, parents, relatives, teachers, neighbors, law enforcement, health care professionals and many others beyond the Child Abuse and Neglect Reporting and Response system.

Section 1

1.1 Implement a structured decision making tool to increase consistency and accuracy in making intake,

screening, risk assessment, service and placement decisions.

In April 2000, the division began working with Children's Research Center, a division of the National Council of Crime and Delinquency in Madison, Wisconsin, to explore the adaptability of a specific structured decision-making model to our system. The first phase would focus on enhancing the current decision making tools used at two points in the system: the hotline, to classify calls received, and in the county office to determine if the report will be treated as an assessment or investigation. Further exploration will take place over the next year regarding other decision points in the system.

1.2 Require that hotline unit call takers check DFS records for prior reports of abuse on the child or family and document that check.

Currently social service workers at the hotline do check DFS records for priors on all calls (approximately 75,000 annually) except those classified as Unable To Investigate (UTI). DFS will work with the Division of Data Processing to implement a tracking system for these types of reports, which will include a check for priors when enough information is known from the caller to determine specific persons' identities. It should be noted that many UTIs do not contain adequate information for clear data collections Implementation will be expected by April 2001.

1.3 Ensure worksheets for reports classified as Unable To Investigate document completely and appropriately the phone reports of abuse received by the hotline unit.

The division is implementing a policy that hotline supervisors will read worksheets and listen to tapes of 10% (as consistent with Council on Accreditation (COA)

expectations for peer reviews) of all calls classified as Unable To Investigate. Supervisors will review the work of staff other than those in their own unit. It should be noted that currently supervisors consult frequently with staff, especially new social service workers, when they are making a decision to classify a report as Unable To Investigate. Staff often seek consultation while the caller is still on the phone. It is also believed that implementing a Structured Decision Making model at the Hotline Unit may further enhance staff decision making. Finally, we are in the process of implementing changes to the MIS database system which will require more complete documentation for data entry and conclusion on reports classified as unable to investigate.

1.4 Improve the hotline unit quality control review process to ensure decisions regarding reports classified as Unable to Investigate are appropriate.

See #1.3

1.5 Enter records regarding reports classified as Unable to Investigate into the automated Production System and retain them.

See #1.2. Records will be maintained for one year.

1.6 Retain tape recordings of hotline calls for possible use in future criminal prosecutions or for review board hearings.

Currently the division keeps tapes of all calls for six months and cooperates by supplying copies of tapes as requested by prosecutors within that time frame. Rarely has the Child Abuse and Neglect Review Board (CANRB) requested a tape and most reviews are held within six months of the finding. Effective January 1, 2001 the division will keep tape recordings of all calls for one year. This will be done as a one-year pilot during which time,

records will be kept regarding the number and type of requests made for copies of the tapes. At the end of one year this practice will be reevaluated.

1.7 Ensure reports are retrieved and acted on by field office staff by establishing a quality control system that requires the hotline unit to reconcile reports sent to field offices to reports printed and taken off the system for action.

As noted in the audit report, the division has made changes to ensure reports are retrieved from the system. Reports are sent from the central registry to the county offices electronically. There is an audio cue from the printer when the report first comes in. Staff check for new reports several times per day in case the audio alert is missed. The ALOG system has been enhanced so that reports remain on the list indefinitely in case the daily checks miss one. In addition, local supervisors are charged with checking the system twice weekly for any that might have been missed and central office staff checks the system twice monthly to be sure all reports have been assigned. No further action is needed.

1.8 Establish a peer review quality control system to ensure policies and practices are consistently followed and applied throughout the DFS child abuse response system.

As a part of the statewide accreditation process begun prior to this review, each year DFS performs a Practice Development Review (PDR) in a judicial circuit in each of the four rural administrative areas of the state, and in each of the three metro areas. The PDR looks at all parts of the child protection system rather than just the division's work. These reviews include comprehensive interviews with the children and family members, as well as other people important in the treatment planning for each family. In addition, interviews are held with

community stakeholders, including mandated reporters, to gain a more complete picture of how the system functions.

Regular peer reviews of all Children's Services programs begin March 2001, as part of the already established accreditation process. This review entails staff at all levels reading records for 10% of all families served by DFS Children's Services. At the hotline, supervisors will read 10% of the reports taken by staff other than those assigned to the supervisor's unit.

1.9 Readdress the DFS study of overturns by the Child Abuse and Neglect Review Board on appeal of probable cause findings and take appropriate corrective action as suggested in the report.

It should be noted that the division's overturn rate on appeals is lower than many other states, including Michigan, which is highlighted for best practices.

DFS will review the report noted above, regarding overturns and determine what action should be taken. A significant error occurred in the report. It states, in FY97 the overturn rate was 44%. In fact the overturn rate was 30%.

The division has already engaged the boards as one of the federally required Citizen Review Panels. In this capacity, the boards will have the opportunity to review files of reports that do not come before them for review, both probable cause and unsubstantiated. There will also be a team within DFS that will read recent CANRB decisions. This will facilitate discussion between the boards and the division regarding decisions made by both parties. Through this dialogue action steps will be identified by April 1, 2001.

1.10 Establish quality controls that ensure the child abuse central registry and the local case records are appropriately corrected to remove the probable cause finding when the alleged perpetrator wins an overturn on appeal.

Effective January 1, 2001, the central office staff supporting the Child Abuse and Neglect Review Board (CANRB) will make the necessary change for each alleged perpetrator in the central registry, when the CANRB overturns an investigation. Local offices will continue to be notified to make the necessary changes in the local file and send out corrected notification letters. This will be ensured through inclusion in the peer review done quarterly for other Children's Services Programs as part of accreditation. Unsubstantiated reports will continue to be expunged according to law.

1.11 Develop a quality control system to ensure DFS is represented at Child Abuse and Neglect Review Board hearings as required by statute.

At present the division staff participate in 95% of the hearings. DFS policy regarding participation in review board hearings will be reaffirmed in a memo to all staff.

1.12 Ensure Children's Service workers are provided adequate guidance and training on their responsibility to make appropriate decisions on whether to represent DFS custody children in probable cause finding appeal hearings.

Children should always be represented at hearings by virtue of the division's participation in the review. In 95% of the cases children were represented. For the 5% of the reviews where staff did not participate county directors will implement a backup plan to ensure representation.

1.13 Send perpetrator notification letters by certified return receipt requested mail.

Contacts with other states have indicated many states do not use certified mail and those that do continue to receive complaints regarding failure to receive notice.

1.14 Redefine hotline unit criteria definitions for preventive service referral classifications to better allow for the best interest of children to be served.

We believe the current system offers better than average preventive services that are in the best interest of the children. Missouri delivers preventive services to children at a rate of 35.9 children per 1,000.

Comparatively, Illinois's child protective services system offers 12.4 children per 1,000 and Michigan's child protective services system serves only 3.9 children per 1,000. (National Child Abuse and Neglect Data System, Child Maltreatment 1998).

1.15 Provide better policy and guidance to field staff on the handling of preventive service referrals.

Effective November 15, 2000, the division implemented a data collection system for all referral categories. Through this mechanism DFS will have specific information, rather than anecdotal, about the actions field staff took with preventive service referrals. The division will analyze the first six months of data to determine what if any guidance is needed for staff by June 2001.

1.16 Improve the understanding of the child abuse and neglect system by mandated reporters and the public by improving the quality and quantity of detailed

information easily available. The DFS should increase efforts to explain what can be expected from the system.

The division was already working on steps to increase the quality and quantity of information available to mandated reporters and the public at large. In March of 2000, DFS policy was implemented for social service workers to contact mandated reporters to share information about the findings and plan how they might work together to provide services for the family.

Changes in legislation strengthened mandated reporter contacts by creating a communication link with schools through a specified liaison within each school district so that information is shared on a regular basis. All of the language in RSMo 210 supports the concept of a strong connection among DFS and all of the other community partners on behalf of children.

Additionally, the division has updated its information packet, made available to all school districts throughout the state, with changes in law and practice. These packets have been available since 1995, and updated as needed.

The central office and local offices participate in innumerable training sessions and community education meetings every year. DFS is also the primary sponsor of a Child Abuse and Neglect Conference held bi-annually which attracts over 1,200 participants. The focus of the conference is on the detection, investigation and treatment of child abuse and neglect as a priority for all community partners.

The division partners with the Children's Justice Task Force and Prevent Child Abuse Missouri to promote professional awareness of Child Abuse and Neglect through the quarterly publication of the "Colleagues for

Children” newsletter. This newsletter specifically written for mandated reporters is distributed to 25,000 professionals across the state. Presently, the division has information available on the DSS web site. The number of website visits to the Child Abuse and Neglect page has increased over the last year.

1.17 Send responses to mandated reporter on the outcome of every call and the reasons for action or inaction.

Action is taken on every mandated reporter call. Current policy dictates staff to contact the mandated reporter within five days of reaching a conclusion regarding the report. At this time, the social service worker discusses the outcome, reason for it and most importantly how the mandated reporter might assist the family.

1.18 Ensure that hotline unit call takers make clear to mandated reporters what action can be expected based on the information provided.

This is existing policy and is included as part of the desk guide check list used by all social service workers at the hotline to ensure appropriate steps are taken with each call. This checklist was developed in December 1999 and all staff received training on its use. There have been numerous reminders for staff regarding this issue. Memos were sent November 5, 1999 and September 14, 2000 and it was a specific agenda item for a meeting of the hotline supervisors in June 2000. In order to monitor this on an ongoing basis, it will be included in the hotline peer review process mentioned in #1.8.

1.19 Develop methods to identify and disseminate best practices throughout the DFS system.

Through an initiative which began in 1996 to promote community based child protection, supported through the Edna McConnell Clark Foundation, the division is

participating in the development of a “Best Practices Tool Kit” along with the Family Investment Trust, the Children’s Trust Fund and Citizens for Missouri’s Children. This package will give ideas to all community members, including DFS, to help ensure that an overall community system is in place to help protect children. The “Tool Kit” should tentatively be available in the summer of 2001.

Area staff meets monthly with central office staff to discuss policy and procedures, new initiatives and areas of concern. Quarterly Continuous Quality Improvement (CQI) meetings, which is part of the accreditation process, offer an opportunity to share ideas and to learn from each other. The PDR and peer review processes present further learning experiences.

1.20 Ensure DFS Children’s Services goals are valid and measurable.

The auditor’s report notes a single discrepancy. This was corrected prior to their review.

Section 2

2.1 Ensure that the CA/N investigations and assessment are completed within the required timeframe.

DFS acknowledges the need to address overdue reports. Area office staff report that contacts have been completed with families to ensure that children are safe and services have been provided. The overdue reports reflect a need for system updates and documentation of actions taken. Current practices identify monthly each overdue report for each county by incident number. Central office has allowed overtime for staff to complete necessary documentation and system updates, and has worked with area staff to make a plan for each area of the state. The additional staff allocations received in the FY 2000 and

2001 budgets and requested in the FY 2002 budget will greatly enhance the ability of the agency to address this important issue. The division will monitor this monthly with the area offices and make corrective action plans.

2.2 Ensure all accreditation council and other appropriate standards available as staffing planning tools are used to establish staffing allocations and future needs and goals.

Current practice.

2.3 Perform time and workload studies to help determine needed staff allocations.

The division uses standards established through the Council on Accreditation.

2.4 Relocate open staff positions from areas unable to fill positions to areas where the positions can be filled, when necessary or beneficial.

The division has conscientiously worked to assure the protection of all children in Missouri. In 1999, a new staffing request for 174 social service workers, was made as part of the statewide accreditation process and was appropriated. These allocations were specifically identified in the budget for the three metro areas where need is the greatest. These areas represent 35% of the population of children in Missouri and 31% of all hotline reports.

DFS continues to request more staff for other areas of the state, including this year's 2000 appropriation request for 105 social service workers and 143 new social services workers for FY 2001.

- 2.5 Develop a special team of investigators to assist “problem” areas and help ease the local offices’ caseloads. This team could be sent to help counties who are having problems completing CA/Ns and making initial contacts on cases within the required time frames.**

The division believes a special team would not be necessary if staffed at COA standards.

- 2.6 Increase salaries for both social worker and supervisor positions to make DFS jobs more competitive with surrounding states and private organizations whom hire social workers.**

The division continues to support salary increases for all staff as revenue resources allow.

- 2.7 Provide increased financial compensation to workers who obtain advanced degrees or certifications.**

The division supports educational advancement for staff by paying tuition, books, and fees for employees working on MSW degrees, as well as accommodating flexible work schedules.

- 2.8 Ensure that each full time Children’s Services social worker is provided with a state-owned cellular phone.**

The division has made 629 cell phones available state-wide for staff to use when out of the office and on call.

- 2.9 Provide Children’s Services social workers with laptop computers and standard automated forms and letters and/or dictation equipment and transcription services.**

The division has been working on a comprehensive management information system and by April 2001, all staff

will have computers. Approximately 763 of the available computers are laptops.

Through the rest of this fiscal year the division will be testing a case management application that will include standard automated forms, letters, and other enhancements.

2.10 Provide specialized training for:

- **New staff by setting minimum on-the-job training requirements to be followed by each local office.**

The division currently has provisions for on the job training and provides supervisors and new staff a guide to help facilitate this part of the skill building process. DFS is in the process of extending basic training to a two-year approach that will also include on-the-job training components.

The three metro areas have more specifically designed on-the-job training components that were developed with assistance from the division's training unit.

- **Front line staff and supervisors on how to use the two track (Investigation/Family Assessment) system to achieve the best possible results and to meet DFS management goals for the system.**

The division began implementing the two track system in 1995. An evaluation was performed and necessary changes in legislation occurred in order to make this statewide practice. Counties adopted the new practice incrementally and each county received training prior to their individual implementation. The practice was in place in all counties by June 1999.

The division has training planned for spring 2001 that will focus on supervisors and their ability to provide

consultation and support to their staff. The supervisors, with consultation from central office training and policy staff, will in turn present training to the social service workers. Section 210 RSMo provides for annual training for staff.

- **Staff involved in CA/N investigations. This training should teach staff to adequately investigate, document and present investigation cases, increasing child safety and decreasing overturns on alleged perpetrators appeals.**

It should be noted that the division's overturn rate on appeals is lower than many other states, including Michigan, which is highlighted for best practices. A new decision item in the FY 2002 budget addresses the need for additional training staff. These trainers would provide skill building regarding the subjects mentioned above as well as other issues involved in the division's services to children and families.

2.11 Develop Investigation teams for low population county groups to ensure specially trained workers and supervisors handle CA/N cases. These employees should not have other duties that interfere with their primary children's services functions.

The cost of this recommendation is prohibitive. In many rural judicial circuits, the number of reports is so low, it would be difficult to justify the number of full time staff necessary to also ensure adequate coverage for a large geographic area. For example, Circuit 4 includes the five counties of Atchison, Gentry, Holt, Nodaway and Worth. In a three-month period from July through September 2000, these counties received a combined total of 57 reports, or monthly average of 19. This would imply the need for just over one full time worker. The large geographic area and the unpredictable nature of hotline reports, coupled with the need to have staff available for

emergencies 24 hours every day makes it impossible to staff with only one part time and one full time person.

The division has other mandated responsibilities for children in addition to investigations and assessments. All of which are primary functions for social service workers. We now staff smaller counties with social service workers who are responsible for a variety of duties. Services to families are often more consistent when the same worker can remain involved with a given family instead of reassigning staff after different phases of work are accomplished. By combining functions the division makes better use of personnel and provides a more holistic approach to assuring safety and permanency for children. It is important that caseload sizes are appropriate as consistent with COA and the division continues to advocate for full staffing in all counties.

2.12 Make better use of compensatory time monitoring system to more effectively manage its accumulation and use. Compensatory time should be:

- **Used before annual leave.**

DSS administrative policy 2-108 indicates supervisors may not require employees to use their compensatory time after the workweek...unless prior approval from the division personnel officer is received. Many social service workers have accrued maximum annual leave and would lose annual leave if forced to use compensatory time instead.

- **Used within a reasonable time frame.**

DFS encourages staff to use compensatory time within the week it is earned. County directors and supervisors work with staff to try to arrange this. In many instances however, this is not possible. DFS will continue to follow DSS policy regarding earning and using

compensatory time. Full staffing would help alleviate the need for earning compensatory time.

- **Monitored for purposes of planning future staff allocations and identifying staffing problems or inequities.**

Compensatory time is tracked through the attendance process that also includes sick leave and vacation. Each county office has responsibility for approving and tracking earned and used time for each worker based in the county.

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